

EXHIBIT A

Proposed Form of Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

THE ART INSTITUTE OF PHILADELPHIA
LLC, *et al.*,
Debtors.

Chapter 7
Case No. 18-11535 (LSS)

(Jointly Administered)

GEORGE L. MILLER, Chapter 7 Trustee,
Plaintiff,

– against –

TODD S. NELSON, JOHN R. McKERNAN,
SAMUEL C. COWLEY, EDWARD WEST,
MARK A. McEACHEN, FRANK JALUFKA,
J. DEVITT KRAMER, MARK NOVAD, JOHN
DANIELSON, AND MICK BEEKHUIZEN,
Defendants.

Adv. Proc. No. 20-50627 (LSS)

[PROPOSED] ORDER DISMISSING TRUSTEE’S COMPLAINT

This matter having come before the Court upon the Motion of Defendants John R. McKernan, Edward West, and Mick Beekhuizen (“Defendants”), by and through their respective counsel, for an order dismissing the Trustee’s Complaint dated June 17, 2020; and the Court having considered all written submissions and arguments of counsel in support of and in opposition to the Motion,

IT IS on this _____ day of _____, 20____,

ORDERED that Defendants’ Motion to Dismiss is hereby GRANTED; and it is further

ORDERED that Trustee’s Complaint is DISMISSED WITH PREJUDICE.